

FILED

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
FORT MYERS DIVISION

09 OCT 14 PM 6:03

CLERK, U.S. DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
FT. MYERS, FLORIDA

UNITED STATES OF AMERICA

v.

DEBRA LANDBERG

CASE NO. 2:09-CR-89-FtM-99DNF
18 U.S.C. § 1014
18 U.S.C. § 1001
18 U.S.C. § 982(a)(2)

INDICTMENT

The Grand Jury charges:

COUNT ONE

(Loan and Credit Application Fraud - 18 U.S.C. §§ 1014 and 2)

On or about July 19, 2006, in Collier County, in the Middle District of Florida,

DEBRA LANDBERG,

defendant herein, aided and abetted by others, for the purpose of influencing the actions of the Bank United, an institution the accounts of which were insured by the Federal Deposit Insurance Corporation, upon an application, commitment, and loan in the amount of \$388,000.00, applied for and received by "H.F." and "S.F.", did knowingly make and cause to be made false statements, in that the defendant caused to be stated and represented, that:

Applicants' combined account balance was \$353,209.09;

whereas, in truth and fact as the defendant then and there well knew,

Applicants' combined account balance was \$13.57.

In violation of Title 18, United States Code, Sections 1014 and 2.

COUNT TWO

(Loan and Credit Application Fraud - 18 U.S.C. §§ 1014 and 2)

On or about April 17, 2007, in Collier and Charlotte County, in the Middle District of Florida,

DEBRA LANDBERG,

defendant herein, aided and abetted by others, for the purpose of influencing the actions of the Bank United, an institution the accounts of which were insured by the Federal Deposit Insurance Corporation, upon an application, commitment, and loan in the amount of \$389,481.61, applied for and received by "S.F.", did knowingly make and cause to be made false statements, in that the defendant caused to be stated and represented, that:

Applicant's combined account balance was \$177,655.58;

whereas, in truth and fact as the defendant then and there well knew,

Applicant's combined account balance was \$957.18

In violation of Title 18, United States Code, Sections 1014 and 2.

COUNT THREE

(Loan and Credit Application Fraud - 18 U.S.C. §§ 1014 and 2)

On or about August 22, 2007, in Collier County, in the Middle District of Florida,

DEBRA LANDBERG,

defendant herein, aided and abetted by others, for the purpose of influencing the actions of CitiBank, an institution the accounts of which were insured by the Federal Deposit Insurance Corporation, upon an application, commitment, and loan in the amount of \$1,500,000.00, applied for and received by "S.F.", did knowingly make and cause to be made false statements, in that the defendant caused to be stated and represented, that:

Applicant's combined account balance was \$146,264.77;
whereas, in truth and fact as the defendant then and there well knew,

Applicant's combined account balance was \$1,774.50,

In violation of Title 18, United States Code, Sections 1014 and 2.

COUNT FOUR

On or about June 4, 2009, in Collier County, in the Middle District of Florida,
the defendant herein,

DEBRA LANDBERG

in a matter within the jurisdiction of the United States, did knowingly and willfully
make false, fraudulent, and fictitious material statements and representations of material
facts, in that during an interview with "K.M." and "M.C.", representatives of the Federal
Bureau of Investigation, the defendant falsely stated that she only completed one false
Verification of Deposit for "S.F." and "H.F."

All in violation of Title 18, United States Code, Section 1001(a)(2).

FORFEITURE

1. The allegations contained in Counts One through Three of this Indictment
are hereby realleged and incorporated by reference for the purpose of alleging forfeitures
pursuant to the provisions of Title 18, United States Code, Section 982.

2. The defendant, Debra Landberg, shall forfeit to the United
States of America, pursuant to Title 18, United States Code, Section 982(a)(2), and
property constituting, or derived from, proceeds the defendant obtained directly or
indirectly, as the result of such violations of Title 18, United States Code, Section 1014, as
alleged in Counts One through Three of this Indictment.

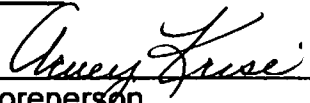
3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,


the United States of America shall be entitled to forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1)(2).

Dated: 10/14/09

A TRUE BILL,


Foreperson

A. BRIAN ALBRITTON
United States Attorney

By: 
David L. Haas
Assistant United States Attorney

By: 
Douglas Molloy
Assistant United States Attorney
Chief, Fort Myers Division

UNITED STATES DISTRICT COURT
Middle District of Florida
Fort Myers Division

THE UNITED STATES OF AMERICA

vs.

DEBRA LANDBERG

INDICTMENT

Violations:

Title 18, United States Code, Sections 1014, 1001 and 2.

A true bill


Foreperson

Filed in open court this 14th day
of October, A.D. 2009.

Clerk

Bail \$ _____